

24 March 2021

Stormwater NSW Response to the National Water Reform Draft Report 2020

Dear Commissioners,

Thank you for the opportunity for Stormwater NSW to provide a response to the National Water Reform Draft Report 2020. As highlighted in the report, stormwater plays a pivotal role in securing the water supply, urban amenity and environmental outcomes desired for our nation. We would like to acknowledge, as discussed in the report, that the National Water Initiative has made great strides since 2004 in securing water for the many required uses and in strengthening governance and transparency of use around this critical resource. In the context of the highly variable rainfall and increasing occurrence of extreme events, both drought and flood, it is critical that water is actively and appropriately managed at all scales within Australia.

We agree with the key finding that there is a lack of clarity about how alternative water sources (including stormwater but also treated wastewater) fit within the entitlements system — potentially impeding investment. Significantly though, how they are managed within the entitlements and planning frameworks further inhibits willingness to plan for and invest in these water resources. As such, we agree with the recommendation to improve on the entitlements framework to ensure entitlements are statutory based, including for jurisdictions to establish a process for determination of whether alternate sources can be included in current arrangements.

Regarding urban water services, it has been a key frustration for the stormwater industry that funding and institutional commitments were limited to absent with respect to stormwater management. While pricing policies have been developed, they remain inadequate and inflexible. There is an urgent need to legislate to support collaborations between levels of government and relevant actors. There is also a critical need for clear demarcations of authority and accountability over catchments and their waterways directly linked to adequate, secure and ongoing funding for their management. These needs are urgently needed because local councils, utilities and government agencies are currently planning without any certainty of responsibility for the integration of water and provision of urban water services.

In the face of growth pressures, changing climate consideration of flooding, water security, amenity and environmental health, future stormwater investment requirements are significant and sorely needed. Governance and the legislation to support it, remains inadequate. Because authority and responsibility remain ambiguous, so does the willingness and ability of organisations to invest in infrastructure or commit to longer term ownership and maintenance.

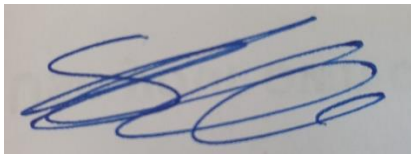
The recommendation of best practise system planning is also strongly supported. With a framework of effectively integrated system planning, full options consideration (and a strong commitment to it) and assignment of roles and responsibilities can meaningfully address the

current shortcomings. Updating the National Urban Water Planning Principles to be embedded within the NWI, in conjunction with best practise guidelines and contingency planning for regional and remote areas would see this considerable gap addressed.

In summary, we agree with key findings and fully support the recommendations outlined in the National Water Reform Draft Report 2020.

We appreciate the time taken to consider our position in finalising the report and recommendations. If you have any further question, please contact us at admin@stormwaternewsw.asn.au.

Yours sincerely,



Dr Stephanie Kermodé
Advocacy, Stormwater NSW



Dr Andrew Thomas
Vice President, Stormwater NSW